

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

**ASUS TECHNOLOGY LICENSING INC.  
AND CELERITY IP, LLC,**

Plaintiffs,

Civil Action No. 2:23-cv-409

v.

**SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
AND SAMSUNG RESEARCH AMERICA,**

Defendants.

**JURY TRIAL DEMANDED**

**SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
AND SAMSUNG RESEARCH AMERICA,**

Counterclaim-Plaintiffs,

v.

**ASUS TECHNOLOGY LICENSING INC.,  
CELERITY IP, LLC, AND ASUSTEK  
COMPUTER, INC.**

Counterclaim-Defendants.

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**DECLARATION OF CHAD HILYARD IN SUPPORT OF PLAINTIFFS' MOTION TO  
DISMISS AND/OR SEVER COUNTERCLAIMS AGAINST ASUSTEK**

**DECLARATION OF CHAD HILYARD**

I, Chad Hilyard, declare as follows:

1. I am the co-founder and CEO of Celerity IP, LLC ("Celerity"). I submit this declaration in support of Plaintiffs' Motion to Dismiss and/or Sever Counterclaims Against ASUSTeK Computer, Inc. ("ASUSTeK"). I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could testify to its contents.
2. I participated in the pre-suit negotiations between Celerity and Samsung relating to the Asserted Patents.
3. ASUSTeK had no decision making authority relating to the Asserted Patents in the pre-suit negotiations.
4. The decision to file this case was made by Celerity. ASUSTeK did not have control over whether this case was filed.
5. For all of the patents asserted in this case, ASUSTeK does not have the right to make decisions about whether to file a lawsuit, nor does ASUSTeK have the right to license those patents.

Executed on April 2, 2024. I declare under penalty of perjury that the foregoing is to the best of my knowledge and belief.

By:

  
\_\_\_\_\_  
Chad Hilyard

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on April 2, 2024.

/s/ Robert Christopher Bunt  
Robert Christopher Bunt